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REQUEST FOR JUDICIAL NOTICE

PLEASE TAKE NOTICE that on January 9, 2024, 1:30 p.m., before the Hon. Judge: The Honorable John A. Mendez, Courtroom 6, in the above-entitled court at 501 I Street, Sacramento, CA, Plaintiff Arnold Abrera, respectfully request that the Court take judicial notice of the public record and facts identified below, which are not subject to reasonable dispute, under Federal Rule of Evidence 201.

A fact is judicially noticeable when it is not subject to reasonable dispute and “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Judicial notice is mandatory if “a party requests it” and the court is “supplied with the necessary information.” Fed. R. Evid. 201(c)(2). Judicial notice may be taken at any stage of the proceeding. Fed. R. Evid. 201(d); *Papai v. Harbor Tug & Barge Co.*, 67 F.3d 203, 207 n.5 (9th Cir. 1995), *overruled on other grounds*, 520 U.S. 548 (1997).

This Court may take judicial notice of matters of public record, including court filings and orders from other cases. *Papai*, 67 F.3d at 207 n.5 (judicial notice may be taken of “decisions made by other courts or administrative agencies”) (citations omitted); *DeHoog v. Anheuser-Busch InBev SA/NV*, 899 F.3d 758, 762 n.5 (9th Cir. 2018) (taking judicial notice of “government documents, court filings, press releases, and undisputed matters of public record”). “[T]he court can take judicial notice of ‘public records and government documents available from reliable sources on the Internet, such as websites run by governmental agencies.’” *Romero v. Securus Technologies, Inc.*, 216 F. Supp. 3d 1078, 1084, n.1 (S.D. Cal. 2016) (internal citation omitted).

Here, Plaintiff respectfully request that this Court take judicial notice of the following court record and facts, which are not subject to reasonable dispute:

1. A true and correct copy of relevant portions of DECLARATION OF ARNOLD ABRERA IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION with

1 First Amended Complaint attached as **Exhibit “1”** in this case located at Docket
2 entry 20 and filed on 10/20/22.

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4 **2.** Felony Complaint filed by Anne Marie Schubert, in her official capacity as County
5 of Sacramento District Attorney, on March 18, 2021, captioned *People vs. Arnold*
6 *Abrera*, Sacramento Superior Court case number 21FE004857, with arrest warrant
7 was requested on or after January 29, 2021.
- 8 **3.** Petition for Judicial Determination Re: Return of Firearms Welfare & Institutions
9 Code section 8102 was filed by defendant Jonathan P. Hobbs as the City of Elk
10 Grove Attorney, captioned *City of Elk Grove vs. Euginie Abrera*, Sacramento
11 Superior Court case number 34-2021-20000745.
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15 DATED: December 5, 2023

16 Respectfully submitted,
17 LAW OFFICES OF GARY W. GORSKI
18 /s/ Gary W. Gorski
19 GARY W. GORSKI
20 Attorney for Plaintiff Arnold Abrera
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